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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

NXIVM CORPORATION, formerly known as EXECUTIVE SUCCESS PROGRAMS, INC. and FIRST PRINCIPLES, INC.,	:	
Plaintiffs,	:	Civil Action No. 2:06-cv-01051
- against -	:	(KSH/CLW)
MORRIS SUTTON, ROCHELLE SUTTON, THE ROSS INSTITUTE, RICK ROSS a/k/a "RICKY" ROSS, STEPHANIE FRANCO, PAUL MARTIN, Ph.D., and WELLSPRING RETREAT, INC.,	:	Hon. Katharine S. Hayden, U.S.D.J. Hon. Cathy L. Waldor, U.S.M.J.
Defendants.	:	Motion Day: April 19, 2021
RICK ROSS,	x	<b>NOTICE OF CROSSCLAIM PLAINTIFF INTERFOR, INC.'S CROSS-MOTION TO COMPEL COMPLIANCE WITH WRIT OF EXECUTION, OR, ALTERNATIVELY, FOR AN ORDER DIRECTING TOMPKINS MCGUIRE TO TURN OVER NXIVM FUNDS TO INTERFOR</b>
Counterclaim Plaintiff,	:	<b><u>(Interfor, Inc. v. NXIVM Corp.)</u></b>
- against -	:	
KEITH RANIERE, NANCY SALZMAN, KRISTIN KEEFFE, INTERFOR, INC., JUVAL AVIV, JANE DOE and JOHN DOES 1-10,	:	
Counterclaim Defendants.	:	
INTERFOR, INC. and JUVAL AVIV,	x	
Crossclaimants,	:	
- against -	:	
NXIVM CORPORATION, KEITH RANIERE, NANCY SALZMAN and KRISTIN KEEFFE,	:	
Crossclaim Defendants.	:	

TO: Brian English, Esq.  
TOMPKINS MCGUIRE  
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**PLEASE TAKE NOTICE** that on April 19, 2021, at 9:00 a.m., or as soon thereafter as counsel may be heard, crossclaim plaintiff Interfor, Inc. (“Interfor”) shall cross-move before the Honorable Cathy L. Waldor, U.S.M.J., seeking an Order: (1) directing *pro se movant* Tompkins, McGuire, Wachenfeld & Barry LLP (“Tompkins McGuire”) to comply with the Writ of Execution served on Tompkins McGuire by Interfor, or, alternatively, (2) directing Tompkins McGuire to transfer \$50,000 in funds belonging to its former client, crossclaim defendant NXIVM Corp. (“NXIVM”), to Interfor (through the below-signed counsel) in partial satisfaction of a final judgment entered by this Court in favor of Interfor and against NXIVM.

The grounds for this motion are set forth in the following documents filed herewith: (i) Crossclaim Plaintiff Interfor, Inc.’s Brief in Opposition to Tompkins McGuire’s Motion to Quash Writ of Execution and to Apply Funds to Outstanding Bills and in Support of Cross-Motion to Compel Compliance with Writ or Transfer Funds to Interfor, dated April 5,

2021; and (ii) the Declaration of Andrew M. Englander, dated April 5, 2021, and the exhibits thereto.

A proposed form of Order is attached.

Dated: Newark, New Jersey  
April 5, 2021

FRIEDMAN KAPLAN SEILER &  
ADELMAN LLP

s/ Andrew M. Englander

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